

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

MAR 0 9 2016

Clerk, U.S. District Court

UNITED STATES OF AMERICA	§	Texas Eastern
	§	
v.	8 8	NO. 4:16CR16
CRAIG ANTHONY LIKUS (1)	\$ §	Judge Mazzant
a.k.a. "Graig"	§	•
a.k.a. "Skinny"	§	
LINDSAY GEORGE (2)	§	
TERRY JAMES KEEL (3)	§	
a.k.a. "TJ Keel"	§ .	
TONYA LEANNE HAMILTON (4)	§	
BRANDON VINCENT TRAVIS (5)	§	
ROBYN SHIRLEY (6)	§	
CHAS MORRISON (7)	§ ·	

SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)

From in or about January, 2013, and continuing up to and including the date of this indictment, in the Eastern District of Texas and elsewhere, **Craig Anthony Likus**, a.k.a. "Graig," a.k.a. "Skinny;" **Lindsay George**; **Terry James Keel**, a.k.a. TJ Keel; **Tonya Leanne Hamilton**; **Brandon Vincent Travis**; **Robyn Shirley**; and **Chas Morrison**, defendants, did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the grand jury to distribute and possess with intent to distribute 50 grams or more of methamphetamine, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine; a violation of 21 U.S.C. § 841(a)(1).

Indictment/Notice of Penalty - Page 1

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE (Pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 924(d)(1))

As a result of the commission of the foregoing offense in Count One of the Indictment,

the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property

used to facilitate the foregoing offense or constituting or derived from proceeds the defendants

obtained directly or indirectly as a result of the foregoing offense.

Substitute assets

If any property subject to forfeiture as a result of any act or omission by the defendants

(i) cannot be located upon the exercise of due diligence, (ii) has been transferred or sold to, or

deposited with a third party, (iii) has been placed beyond the jurisdiction of the court, (iv) has

been substantially diminished in value, or (v) has been commingled with other property which

cannot be subdivided without difficulty, the defendants shall forfeit to the United States any

other property of the defendants up to the value of the forfeitable property.

A TRUE BILL

GRAND JURY FOREPERSON

JOHN M. BALES

UNITED STATES ATTORNEY

Assistant United States Attorney

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CHAS MORRISON (7)	§	

NOTICE OF PENALTY

Count One

Violation:

21 U.S.C. § 846

Penalty:

(a) If 50 grams of methamphetamine (actual) or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine – not less than 10 years and not more than life, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

If any person commits a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 20 years and not more than life imprisonment, a fine not to exceed the greater than \$20 million, or both; supervised release of at least 10 years. If two or more prior convictions for a felony drug offense have become final, a mandatory term of life imprisonment without release.

(b) If 5 grams of methamphetamine (actual) or 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine – imprisonment for not less than 5 years and not more than 40 years, a fine not to exceed \$5 million, or both; supervised release of at least 4 years;

If any person commits a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 10 years and not more than life imprisonment, a fine not to

exceed the greater than \$8 million, or both; supervised release of at least 8 years.

(c) If less than 5 grams of methamphetamine (actual) or less than 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine – imprisonment of not more than 20 years, a fine not to exceed \$1 million, or both; supervised release of at least 3 years;

If any person commits a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be more than 30 years, a fine not to exceed the greater than \$2 million, or both; supervised release of at least 6 years.

Special Assessment: \$100.00